

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION**

**EXXON MOBIL CORPORATION,**

**Plaintiff,**

**Case No. 1:25-cv-00011-MJT**

**CITY OF BAYTOWN, TEXAS; CITY OF  
BEAMONT, TEXAS; CITY OF MONT  
BELVIEU; and CHAMBERS COUNTY,  
TEXAS,**

**Plaintiff-Intervenors,**

**v.**

**ROBERT ANDRES BONTA A.K.A.  
ROB BONTA, IN HIS INDIVIDUAL  
CAPACITY; SIERRA CLUB, INC.;  
SURFRIDER FOUNDATION, INC.;  
HEAL THE BAY, INC.; BAYKEEPER,  
INC.; AND INTERGENERATIONAL  
ENVIRONMENT JUSTICE FUND LTD.,**

**Defendants.**

**INTERVENORS' CITY OF BAYTOWN, TEXAS; CITY OF BEAMONT, TEXAS;  
CITY OF MONT BELVIEU, TEXAS; AND CHAMBERS COUNTY, TEXAS  
RULE 26(a) INITIAL DISCLOSURES**

**TO: Plaintiff ExxonMobil Corporation, by and through their attorneys of record, Michael Patrick Cash and Wade Thomas Howard, Liskow & Lewis – Houston, First City Tower, 1001 Fannin Street, Suite 1800, Houston, TX 77002.**

**Defendant Robert Andres Bonta a.k.a. Rob Bonta, in his Individual Capacity, by and through his attorneys of record, Robert Wiliam Setrakian, California Attorney General's Office, 300 S. Spring Street, Los Angeles, CA 90027.**

**Defendant Sierra Club, Inc., by and through their attorneys of record, Soctt E. Gant, Boles Schillier Flexner LLP, 1401 New York Ave Nw, Washington, DC 20005.**

**Defendant Surfrider Foundation, Inc., by and through their attorneys of record, Peter D. Kennedy, James Alan Hemphill and Marianne Nitsch, Graves Dougherty Hearon & Moody, PC – Austin, 401 Congress Ave, Suite 2700, Austin, TX 78701.**

**Defendant Heal the Bay, Inc., by and through their attorneys of record, Deborah Greenleaf, Fallin Schwartz and Monica Celeste Vaughan, Tribble & Ross, 6371 Richmond Ave, Houston, TX 77057.**

**Defendant Baykeeper, Inc., by and through their attorneys of record, Michael Forest Nelson and John Holman Barr, Burt Barr & Associates, PO Box 223667, Dallas, TX 75222-3667.**

**Defendant Intergenerational Environment Justice Fund Ltd., by and through their attorneys of record, John Charles Quinn, Joshua Adam Matz and Matthew J. Craig, Hecker Fink LLP, 350 Fifth Avenue Ste 63<sup>rd</sup> Floor, New York, NY 10118.**

Pursuant to Federal Rule of Civil Procedure 26(a) and the Order Setting Civil Action For Rule 16 Management Conference dated April 23, 2025, City of Baytown, Texas (“Baytown”); the City of Beaumont, Texas (“Beaumont”); City of Mont Belvieu (“Mont Belvieu”); and Chambers County, Texas (“Chambers County”) (collectively, the “Intervenors”) provide the following Rule 26(a) Initial Disclosures to Plaintiff Exxon Mobil Corporation (“ExxonMobil”) and Defendants Robert Andres Bonta a.k.a. Rob Bonta (“Bonta”), the California Attorney General being sued in his individual capacity; Sierra Club, Inc. (the “Sierra Club”); Surfrider Foundation, Inc. (“Surfrider”); Heal the Bay, Inc. (“Heal the Bay”); Baykeeper, Inc. (“Baykeeper” and, collectively with the Sierra Club, Surfrider, and Heal the Bay, the “US Proxies”); and Intergenerational Environment Justice Fund Ltd. (the “IEJF” and, collectively with its affiliates, the “Foreign Interests”). Intervenors reserve the right to amend these initial disclosures in accordance with the Federal Rules of Civil Procedure.

**Disclosures Pursuant to Federal Rule of Civil Procedure 26(a) and the Order Setting Civil Action for Rule 16 Management Conference dated April 23, 2025**

**1. The correct names of the parties to the action.**

Exxon Mobil Corporation  
Plaintiff

City of Baytown, Texas  
Plaintiff-Intervenor

City of Beaumont, Texas  
Plaintiff-Intervenor

City of Mont Belvieu, Texas  
Plaintiff-Intervenor

Chambers County, Texas  
Plaintiff-Intervenor

Robert Andres Bonta A.K.A. Rob Bonta, in his individual capacity  
Defendant

Sierra Club, Inc.  
Defendant

Surfrider Foundation, Inc.  
Defendant

Heal the Bay, Inc.  
Defendant

Baykeeper, Inc.  
Defendant

Intergenerational Environment Justice Fund, Ltd.  
Defendant

**2. The name and, if known, the address and telephone number of any potential parties to the action.**

Intervenors are unaware of any potential parties at this time.

- 3. The name and, if known, the address and telephone number of persons having knowledge of facts relevant to a claim or defense of any party, a brief characterization of their connection to the case and a fair summary of the substance of the information known by such person. This may be combined with the list of persons required under Rule 26(a)(1)(A)(i) so that two lists are not needed.**

Felecia Thibodeaux  
c/o Travis C. Barton  
MCGINNIS LOCHRIDGE LLP  
1111 West Sixth Street, Building B, Suite 400  
Austin, Texas 78703  
512-495-6000

Ms. Thibodeaux was, at all relevant times, employed by the City of Beaumont, Texas in the Clean Community Division and, as such, has knowledge of a historical perspective regarding Beaumont's past recycling program, Beaumont's interest in the ExxonMobil advanced recycling program, and other facts relevant to this matter.

Fernando Cedillo  
c/o Travis C. Barton  
MCGINNIS LOCHRIDGE LLP  
1111 West Sixth Street, Building B, Suite 400  
Austin, Texas 78703  
512-495-6000

Mr. Cedillo is the current Operations Manager, Solid Waste employed by the City of Beaumont, Texas has knowledge of a historical perspective regarding Beaumont's past recycling program, Beaumont's interest in the ExxonMobil advanced recycling program, and has knowledge of facts relevant to this matter.

Kenneth Williams  
c/o Travis C. Barton  
MCGINNIS LOCHRIDGE LLP  
1111 West Sixth Street, Building B, Suite 400  
Austin, Texas 78703  
512-495-6000

Mr. Williams was, at all relevant times, employed as the City Manager by the City of Beaumont, Texas and, as such, has knowledge of discussions between Beaumont and ExxonMobil about plastic recycling and other facts relevant to this matter.

Brant Gary  
c/o Travis C. Barton  
MCGINNIS LOCHRIDGE LLP  
1111 West Sixth Street, Building B, Suite 400  
Austin, Texas 78703  
512-495-6000

Mr. Gary is the Assistant City Manager of the City of Baytown, Texas has knowledge of a historical perspective regarding Baytown's past recycling program, Baytown's interest in the ExxonMobil advanced recycling program, and has knowledge of facts relevant to this matter.

Frank Simoneaux  
c/o Travis C. Barton  
MCGINNIS LOCHRIDGE LLP  
1111 West Sixth Street, Building B, Suite 400  
Austin, Texas 78703  
512-495-6000

Mr. Simoneaux is the Director of Public Works and Engineering for the City of Baytown, Texas has knowledge of a historical perspective regarding Baytown's past recycling program, Baytown's interest in the ExxonMobil advanced recycling program, and has knowledge of facts relevant to this matter.

BJ Simon  
c/o Travis C. Barton  
MCGINNIS LOCHRIDGE LLP  
1111 West Sixth Street, Building B, Suite 400  
Austin, Texas 78703  
512-495-6000

Mr. Simon was, at all relevant times, employed as a consultant with West Chambers County Economic Development and, as such, has knowledge of the discussions about plastic recycling between Chambers County, Texas and ExxonMobil and other facts relevant to this matter.

Thomas Hammond  
c/o Travis C. Barton  
MCGINNIS LOCHRIDGE LLP  
1111 West Sixth Street, Building B, Suite 400  
Austin, Texas 78703  
512-495-6000

Mr. Hammond was, at all relevant times, employed as the County Commissioner for Chambers County and, as such, has knowledge of the discussions about plastic

recycling between Chambers County, Texas and ExxonMobil and other facts relevant to this matter.

Brian Winningham  
c/o Travis C. Barton  
MCGINNIS LOCHRIDGE LLP  
1111 West Sixth Street, Building B, Suite 400  
Austin, Texas 78703  
512-495-6000

Mr. Winningham is the City Manager of the City of Mont Belvieu, Texas has knowledge of a historical perspective regarding Mont Belvieu's past recycling program, Mont Belvieu's interest in the ExxonMobil advanced recycling program, and has knowledge of facts relevant to this matter.

Exxon Mobil Corporation  
c/o Michael Patrick Cash  
Wade Thomas Howard  
LISKOW & LEWIS – HOUSTON  
First City Tower  
1001 Fannin Street, Suite 1800  
Houston, TX 77002

Plaintiff has knowledge regarding advanced recycling and community recycling collaborations and other facts relevant to this matter.

Robert Bonta  
c/o Robert William Setrakian  
CALIFORNIA ATTORNEY GENERAL'S OFFICE  
300 S. Spring Street  
Los Angeles, CA 90027  
213-269-6668

Mr. Bonta is a Defendant in this lawsuit and, as such, has knowledge of defendants' communications regarding statements concerning ExxonMobil and advanced recycling, and publication of defendants' statements, and knowledge of Defendants' conspiracy for the same and other facts relevant to this matter.

Custodian of Records and Unknown Employees Officers, Agents and Contractors of the Rob Bonta Campaign  
c/o Robert William Setrakian  
CALIFORNIA ATTORNEY GENERAL'S OFFICE  
300 S. Spring Street  
Los Angeles, CA 90027  
213-269-6668

These persons at all relevant times were employed by Bonta and, as such, may have records and/or other employees with knowledge of facts relevant to this matter.

Sierra Club Inc.  
c/o Soctt E. Gant  
BOLES SCHILLIER FLEXNER LLP  
1401 New York Ave Nw  
Washington, DC 20005  
202-237-2727

Defendant is a party in this lawsuit and, as such, has knowledge of defendants' communications regarding statements concerning ExxonMobil and advanced recycling, and publication of defendants' statements, and knowledge of Defendants' conspiracy for the same and other facts relevant to this matter.

Custodian of Records and Unknown Employees Officers, Agents and Contractors  
of the Sierra Club  
c/o Soctt E. Gant  
BOLES SCHILLIER FLEXNER LLP  
1401 New York Ave Nw  
Washington, DC 20005  
202-237-2727

These persons at all relevant times were employed by the Sierra Club and, as such, may have records and/or other employees with knowledge of facts relevant to this matter.

Surfrider Foundation Inc.  
c/o Peter D. Kennedy  
James Alan Hemphill  
Marianne Nitsch  
GRAVES DOUGHERTY HEARON & MOODY, PC – AUSTIN  
401 Congress Ave, Suite 2700  
Austin, TX 78701  
512-480-5764

Defendant is a party in this lawsuit and, as such, has knowledge of defendants' communications regarding statements concerning ExxonMobil and advanced recycling, and publication of defendants' statements, and knowledge of Defendants' conspiracy for the same and other facts relevant to this matter.

Custodian of Records and Unknown Employees Officers, Agents and Contractors  
of Surfrider  
c/o Peter D. Kennedy  
James Alan Hemphill  
Marianne Nitsch

GRAVES DOUGHERTY HEARON & MOODY, PC – AUSTIN  
401 Congress Ave, Suite 2700  
Austin, TX 78701  
512-480-5764

These persons at all relevant times were employed by the Surfrider and, as such, may have records and/or other employees with knowledge of facts relevant to this matter.

Heal the Bay Inc.  
c/o Deborah Greenleaf  
Fallin Schwartz  
Monica Celeste Vaughan  
TRIBBLE & ROSS  
6371 Richmond Ave  
Houston, TX 77057  
713-252-9575

Defendant is a party in this lawsuit and, as such, has knowledge of defendants' communications regarding statements concerning ExxonMobil and advanced recycling, and publication of defendants' statements, and knowledge of Defendants' conspiracy for the same and other facts relevant to this matter.

Custodian of Records and Unknown Employees Officers, Agents and Contractors of Heal the Bay  
c/o Deborah Greenleaf  
Fallin Schwartz  
Monica Celeste Vaughan  
TRIBBLE & ROSS  
6371 Richmond Ave  
Houston, TX 77057  
713-252-9575

These persons at all relevant times were employed by Heal the Bay and, as such, may have records and/or other employees with knowledge of facts relevant to this matter.

Baykeeper Inc.  
c/o Michael Forest Nelson  
John Holman Barr  
BURT BARR & ASSOCIATES  
PO Box 223667  
Dallas, TX 75222-3667  
214-943-0012



Defendant is a party in this lawsuit and, as such, has knowledge of defendants' communications regarding statements concerning ExxonMobil and advanced recycling, and publication of defendants' statements, and knowledge of Defendants' conspiracy for the same and other facts relevant to this matter.

Custodian of Records and Unknown Employees Officers, Agents and Contractors  
of Baykeeper  
c/o Michael Forest Nelson  
John Holman Barr  
BURT BARR & ASSOCIATES  
PO Box 223667  
Dallas, TX 75222-3667  
214-943-0012

These persons at all relevant times were employed by the Baykeeper and, as such, may have records and/or other employees with knowledge of facts relevant to this matter.

Intergenerational Environmental Justice Fund Ltd.  
c/o John Charles Quinn  
Joshua Adam Matz  
Matthew J. Craig  
HECKER FINK LLP  
350 Fifth Avenue Ste 63<sup>rd</sup> Floor  
New York, NY 10118  
212-763-0886

Defendant is a party in this lawsuit and, as such, has knowledge of defendants' communications regarding statements concerning ExxonMobil and advanced recycling, and publication of defendants' statements, and knowledge of defenants' conspiracy for the same and other facts relevant to this matter.

Custodian of Records and Unknown Employees Officers, Agents and Contractors  
of IEJF  
c/o John Charles Quinn  
Joshua Adam Matz  
Matthew J. Craig  
HECKER FINK LLP  
350 Fifth Avenue Ste 63<sup>rd</sup> Floor  
New York, NY 10118  
212-763-0886

These persons at all relevant times were employed by the IEJF and, as such, may have records and/or other employees with knowledge of facts relevant to this matter.

Niall P. McCarthy  
Tyson C. Redenberger  
Grace Y. Park  
Cotchett Pitre & McCarthy, LLP  
San Francisco Airport Center  
840 Malcolm Road  
Burlingame, CA 94010

These persons have knowledge of defendants' communications regarding statements concerning ExxonMobil and advanced recycling, and publication of defendants' statements, and knowledge of Defendants' conspiracy for the same and other facts relevant to this matter.

**4. The records or the authorizations described in Local Rule CV-34.**

Intervenors are unaware of any records or authorizations that comply with the disclosure requirements.

**5. A copy of all other documents, electronically stored information, witness statements, and tangible things in the possession, custody, or control of the disclosing party that are relevant to a claim or defense of any party. This may be combined with disclosures under Rule 26(a)(1)(A)(ii) so that duplication is avoided. Parties are encouraged to agree upon provision of information by electronic means.**

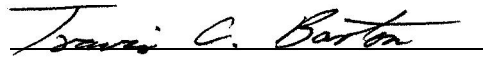
Documents will be produced after a protective order has been entered. These documents will include agreements between the parties relating to recycling programs. The documents may also include communications between the parties relating to Intervenors recycling programs, as well as documents relating to past efforts to start recycling programs. The documents are located and/or possessed by each of the Intervenors at their respective offices.

**6. Information related to the calculation of damages.**

The amount and method for calculating damages will be provided by supplementation at the time that expert reports are required to be disclosed.

Date: May 22, 2025

Respectfully submitted,



Travis C. Barton, SBN: 00790276

[tcbarton@mcginnislaw.com](mailto:tcbarton@mcginnislaw.com)

J. McLean Bell, SBN: 24120712

[mbell@mcginnislaw.com](mailto:mbell@mcginnislaw.com)

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1111 W. 6<sup>th</sup> St, Ste 400

Austin, TX 78703

(512) 495-6000

(512) 495-6093 FAX

Jonathan D. Baughman, SBN: 24029074

[jbaughman@mcginnislaw.com](mailto:jbaughman@mcginnislaw.com)

**MCGINNIS LOCHRIDGE LLP**

609 Main St., Ste. 2800

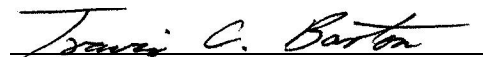
Houston, TX 77002

(713) 615-8500

(713) 615-8585 FAX

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that this document was filed electronically in compliance with Local Rule CV-5(a) on 22<sup>nd</sup> day of May, 2025.



Travis C. Barton